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105. (Amended) A computer-readable medium having a computer program stored thereon for execution on a server computer system, the program comprising:

means downloadable to a client computer for creating a WYSIWYG document in the client's web browser, and,

means for translating the document to a suitable prepress format and for sending the document as translated to a printer through a communications device of the server computer system.

REMARKS

This communication is filed in response to the Office Action mailed June 5;2002. No surcharge or other fee is required by this amendment.

Applicants believe that the above amendments, in view of the accompanying remarks, clearly point out the differences between the Applicants' claimed systems and methods and the reference cited by the Examiner in the Office Action and will place the claims in condition for allowance. Favorable action on the claims is respectfully requested.

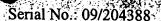
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<u>Title</u>

The title of the application has been amended to more accurately reflect the scope and subject matter of the pending claims.

Claim Objections

The Examiner objected to informalities in claims 62 and 101. The clause of claim 62 containing the word objected to by the Examiner has been deleted. Claim 101 has been amended as suggested by the Examiner.





The Examiner rejected claims 62-105 as being unpatentable over Grasso (U.S. Patent 5,892,909). As discussed below, Applicants believe that the claims as amended are patentable and in condition for allowance.

Looking first at Grasso, the Grasso system is directed solely to the distribution of documents (see col. 1, lines 23-27; col. 4, lines 28-32). Grasso neither discloses nor suggests a system that would allow a user to create and edit WYSIWYG documents in a client browser. The only downloadable programs mentioned in Grasso are Java applets (see, for example, col. 12, lines 3-19 and col. 25, lines 14-24). As discussed at length in Grasso, for example, at col. 5, line 10 to col. 6. line 5, and col. 19, line 42 to col. 25, line 63, these downloadable Java Wizards are simply forms or templates that are used solely to provide a structured process for the exchange of information between clients and the erver to allow the server to set up and perform various types of document distribution: The Wizards are not WYSIWYG documents, are not used to create WYSIWYG documents in the browser, and are not intended to be printed. Grasso teaches a system for using the web to facilitate the distribution of pre-existing materials. Nothing in Grasso suggests that a Web-based system could be used to create the materials in the first place. There is no teaching or suggestion in Grasso that an authoring program might be downloaded to run in a web browser where it might be usefully employed to create and display WYSIWYG documents for printing.

Applicants' claims, by contrast, are directed to systems and methods for the <u>creation</u> of documents. Specifically, creating documents in the client browser in a WYSIWYG format such that when the document is uploaded to the server and printed, the document will be consistent with the WYSIWYG form displayed to the user.

Amended claim 62 claims "a downloadable document authoring program having one or more authoring tools used to author an electronic document, wherein the downloaded program executes in a web browser and displays the electronic document in WYSIWYG form to the user". Grasso does not show or suggest this type of program.

Further, since there is no notion of browser-based WYSIWYG document creation in Grasso, there is similarly no disclosure or suggestion in Grasso of other features in the claim, such as an authoring tool "that allows a user to select and edit at least one element of the electronic document while at least a portion of the electronic document is simultaneously displayed" and producing a document that is "consistent with the WYSIWYG form displayed to the user on the client computer". These same remarks apply to amended independent claim 79.

Claim 66 has been amended to include the log-on feature that had been part of claim 62 prior to this amendment.

Turning to independent claims 95 and 101, it is noted that the Examiner's position regarding these two claims appears inconsistent with the position taken with regard to claims 62 and 79. Claims 62, 79, 95 and 101 all contain similar features related to a document authoring program that runs in a client web browser to create and display a document in WYSIWYG form to the user. Regarding claims 62 and 79, the Examiner appears to take the position that Grasso teaches all of the aforementioned elements. Regarding claims 95 and 101, however, the Examiner states that Grasso does not teach these elements.

Specifically regarding claim 95, the Examiner states "Grasso did not explicitly teach, an authoring program downloaded from a server through a communications device... or an operating environment program, wherein the downloaded program executes in a web browser and displays the electronic document in WYSIWYG form to a user". The Examiner cited no other specific art disclosing any of these features or limitations, but instead simply characterized all of them as being "obvious". The only comment supplied to support the position of obviousness taken by the Examiner was that WYSIWYG is well known in the art.

At the time the invention was made, WYSIWYG was a feature of desktop publishing and word processing software products, such as Microsoft Word. These



products differ in significant ways from Applicants' claimed authoring program. For example, the prior art products are generally licensed products that are either preinstalled on the user's computer by the computer vendor or supplied to the user on a disk or CD-ROM, they are stored permanently in the memory of the client system; and they do not run in the browser but instead run on the client's operation system completely independent of and unrelated to any browser in the client system. As is indicated by Grasso itself (see Publisher's Desktop 1503 in Fig. 15 showing Word as a representative client application for document generation), the generation of documents was considered to be in the domain of client applications running in a different operating environment.

Similar comments apply to independent claim 101. Again in the Examiner's remarks, the Examiner cites no specific art beyond Grasso, but characterizes the several claim features and limitations that were not shown in Grasso as govious. Applicants submit that the teaching of Grasso is far removed from the subject matter of claims 95 and 101 and that someone of ordinary skill in the art at the time the invention was made, even if presented with the Grasso reference, would in no way find it obvious to implement the various elements and limitations of Applicants' claimed system.

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For the reasons stated above in connection with claims 62, 79, 95 and 101, dependent claims 63-78, 80-94, 96-100 and 102-103 are likewise considered to be patentable.

Regarding independent claim 104, the claim has been amended to include the specific limitations that the program executes in the client's web browser and that the document created is a WYSIWYG document. As discussed above, these features are not disclosed or suggested by Grasso and were not obvious at the time the invention was made.

Regarding independent claim 105, the claim has been amended to include the specific limitations that the document is a WYSIWYG document and that the document is created in the client's web browser. As discussed above, these features are not

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disclosed or suggested by Grasso and were not obvious at the time the invention was made.

Applicants respectfully request favorable action by the Examiner and the allowance of claims 62-105.

As indicated in the Revocation and New Power of Attorney mailed June 14, 2002, please direct all future correspondence regarding this application to the undersigned at the address indicated.

Date: September 5, 2002

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Respectfully

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VERSION MARKED TO SHOW CHANGES'

62. (Amended) A computerized prepress method comprising:

storing on a server computer system a computerized prepress software system, wherein the prepress software system includes a downloadable document authoring program [and at least one prepress translation component, further wherein the downloadable authoring program includes] having one or more authoring tools-used-to-author-an-electronic document [and the translation component is used to produce a prepress format file from an authored electronic document];

wherein the downloaded program executes in a web browser and displays the electronic document in WYSIWYG form to the user, and at least one of the authoring tools has one or more functions that allows a user to select and edit at least one element of the electronic document while at least a portion of the electronic document is simultaneously displayed;

the software system further configured to provide that at least one of the authoring tools is adapted to edit an element of the electronic document using the client computer, and that the electronic document is [saved on] uploaded to the server computer system in a form allowing [the] a translation component [executing on the server computer system] to create [the] a prepress format file so that when the prepress format file is used to produce a document the document is consistent with the WYSIWYG form displayed to the user on the client computer, and so that the user need only be concerned with authoring the electronic document and not with creating a prepress format file, and further so that the authored electronic document can be processed into a prepress format file;

[wherein the client computer is one of a plurality of client computers each including a web browser capable of interacting with at least one Internet web site addressed by a uniform resource locator (URL) and the server computer system includes at least one server computer systems connected to the plurality of client computers over the Internet;



sending log-on information regarding a user from a client computer to the server computer system over the Internet and authenticating the user at the server computer system;]

downloading the authoring program from the server computer system to the client computer;

the user using at least one authoring tool of the downloaded program at the client computer to edit an element of an electronic document;

[saving] uploading the electronic document [in an internal format at] to the server computer system [; and

using the translation component, translating the electronic document from the internal format to a different suitable prepress format file usable to produce a corresponding document on a printing device.

60. (Amended) The computerized prepress method of claim 62. [wherein authenticating the user at the server computer system comprises associating the user with at least one of a particular directory on the server computer system, a set of defaults regarding fonts, colors, images and commands available to the user, and an authorization level selected from the group of authorization levels essentially comprising normal, administrator, and demonstration] comprising the additional steps of sending log-on information regarding a user from a client computer to the server computer systems over the Internet and authenticating the user at the server computer system.

79. (Amended) A computerized prepress system comprising:

a server having stored thereon a computerized prepress software system including a downloadable document authoring program [and at least one prepress translation component, further wherein the downloadable authoring program includes] having one or more authoring tools used to author an electronic document [and the translation component is adapted to produce a prepress format file from an authored electronic document];

wherein the downloaded program executes in a web browser of a client computer and displays the electronic document in WYSIWYG form to the user, and at least one of

the authoring tools has one or more functions that allows a user to select and edit at least one element of the electronic document while at least a portion of the electronic document is simultaneously displayed;

the software system further configured to provide that at least one of the authoring tools is adapted to edit an element of the electronic document using the client computer, and that the electronic document is [saved on] <u>uploaded to</u> the server computer system in a form allowing [the] <u>a</u> translation component [executing on the server computer system] to create the prepress format file so that when the prepress format file is used to produce a document the document is consistent with the WYSIWYG form displayed to the user on the client computer, and so that the user need only be concerned with authoring the electronic document and not with [the] creating a prepress format file [, and further so that the authored electronic document can be processed by the server computer system into a prepress format file and

wherein the client computer is one of a plurality of client computers each including a web browser capable of interacting with at least one Internet web site addressed by a uniform resource locator (URL) and the server computer system is one of at least one server computer systems connected to the plurality of client computers over the Internet].

- 95. (Amended) A client computer comprising:
 - a processor;
 - a computer-readable medium;
 - a communications device;
- an operating environment program comprising a web browser executed by the processor from the medium; and

an authoring program downloaded from a server through the communications device and executed by the processor from the medium within the operating environment program, wherein the downloaded program executes in [a] the web browser and displays the electronic document in WYSIWYG form to the user, and at least one of the authoring tools has one or more functions that allows a user to select and edit at least one element

of the electronic document while at least a portion of the electronic document is simultaneously displayed;

further wherein the authoring is adapted to provide that the authoring tools edit an element of an electronic document and that the electronic document is [saved on] uploaded to the server computer system in a form allowing a translation program [executing on the server computer system] to create the prepress format file so that when the prepress format file is used to produce a document the document is consistent with the WYSIWYG image displayed to the user on the client computer by the authoring program, and so that the user need only be concerned with authoring the electronic document and not with [the] creating a prepress format file [, and further so that the authored electronic document can be processed by the server computer system into a prepress format file].

- 101. (Amended) A server computer system comprising: .
 - a processor;
 - a computer-readable medium;
 - a communications device:

an authoring program stored on the computer-readable medium for downloading through the communications device and [use] <u>used</u> by a client computer to create an electronic document, wherein the authoring program includes one or more document authoring tools and further wherein at least some of the authoring tools are adapted to author an electronic document;

wherein the downloadable authoring program is adapted to execute in a web browser and display the electronic document in WYSIWYG form to the user, and at least one of the authoring tools has one or more functions that allow a user to select and edit at least one element of the electronic document while at least a portion of the electronic document is simultaneously displayed;

the authoring program adapted to provide that the authoring tools edit an element of an electronic document and that the electronic document is [saved on] <u>uploaded to</u> the server computer system in a form allowing a translation program [executing on the server computer system] to create the prepress format file so that when the prepress format file

is used to produce a document the document is consistent with a WYSIWYG image displayed to the user on the client computer by the authoring program, and so that the user need only be concerned with authoring the electronic document and not with [the] creating a prepress format file [, and further so that the authored electronic document can be processed by the server computer system into a prepress format file; and

the translation program executed by the processor from the computer-readable medium].

104. (Amended) A computer-readable medium having a computer program stored thereon for downloading to a client computer from a server computer system and for execution on the client computer within [an operating environment program] the client's web browser, the program comprising means for creating a <u>WYSIWYG</u> document, which is uploaded to the server through a communications device for translation to a suitable prepressylormat and submission to a printer.

105. A computer-readable medium having a computer program stored thereon for execution on a server computer system, the program comprising:

means downloadable to a client computer for creating a <u>WYSIWYG</u> document <u>in</u> the client's web browser, and,

means for translating the document to a suitable prepress format and for sending the document as translated to a printer through a communications device of the server computer system.